



## POCONO TOWNSHIP PLANNING COMMISSION

### AGENDA

March 10, 2025 6:00 p.m.

112 Township Drive | Tannersville, PA 18372

**Dial-In Option: 646 558 8656**

**Meeting ID: 892 102 5946**

**Passcode: 18372**

### CALL TO ORDER

### PLEDGE OF ALLEGIANCE

### ROLL CALL

### PUBLIC COMMENT

*For any individuals wishing to make public comment tonight, please state the spelling of your name and identify whether you are a taxpayer of Pocono Township.*

### CORRESPONDENCE

### OLD BUSINESS

- Motion to approve the minutes of the February 10, 2025 meeting of the Pocono Township Planning Commission. **(Action Item)**

### SEWAGE PLANNING MODULES:

### WAIVERS OF LAND DEVELOPMENT:

### SKETCH PLANS

Exclusive Pocono Properties – LDP 1422

### NEW PLANS

### FINAL PLANS UNDER CONSIDERATION

### PRELIMINARY PLANS UNDER CONSIDERATION

- Brookdale Spa (LDP #1425) – Plans were administratively accepted at the 9/9 24 P.C. meeting with approval deadline of May 8, 2025 **Deadline for P.C. consideration is 4/14/25. (Possible Action Item)**  
Waiver Requests & Motion **(Possible Action Items)**

- 611 Land Development LLC (LDP #1401) – Dual Brand Hotel – Hotel by Marriot -Plans administratively accepted at the 4/8/24 P.C. meeting. Approval deadline of June 17, 2025. **Deadline for P.C. consideration is 6/9/25 (Possible Action Item)**
- Swiftwater Solar Revision – (LDP 1375A) – Plans were administratively accepted at the 1/13/25 P.C. meeting. Approval deadline of June 13, 2025 **Deadline for P.C. consideration is 6/9/25. (Possible Action Item)**
  - Motion to recommend Phases “A” & “D” for approval to the Board of Commissioners. **(Action Item)**
- Trap Enterprises Event Center – (LDP 1438) – Plans were administratively accepted at the 1/13/25 P.C. meeting. Approval deadline of June 13, 2025 **Deadline for P.C. consideration is 6/9/25 (Possible Action Item)**

Motion to table the following plans **(Action Item)**:

MCTA Transit Facilities Expansion – (LDP 1437) – Plans were administratively accepted at the 12/9/24 P.C. meeting with approval deadline of June 3, 2025. Deadline for P.C. consideration is 5/12/25.

1124 Sky View Drive Mono-pine Tower (LDP# 1424) – Plans were administratively accepted at the 4/8/24 P.C. meeting with approval deadline of June 4, 2025. Deadline for P.C. consideration is 5/12/25.

Tannersville Point Apartments (LDP# 1358) – Plans were administratively accepted at the 6/10/24 P.C. meeting. Approval deadline of May 31, 2024 Deadline for P.C. consideration is 05/12/25

Cranberry Creek Apartments Land Development Plan (LDP# 1369) – Plans were administratively accepted at the 7/25/22 P.C. meeting. Extension letter request received with approval deadline of August 4, 2025. Deadline for P.C. consideration is 7/14/25.

135 Warner Road – JBAR Pocono LLC (LDP# 1414) – Plans were administratively accepted at the 2/12/24 P.C. meeting. Approval deadline of September 9, 2025. Deadline for P.C. consideration is 8/10/25.

Alaska Pete’s Roadhouse Grille (173 Camelback Road) Land Development Plan (LDP# 1387) – Plans were administratively accepted at the 4/10/23 P.C. meeting. Extension request received with approval deadline of December 31, 2025. Deadline for P.C. consideration is 12/8/25.

## **SPECIAL EXCEPTIONS, CONDITIONAL USE, ET AL, APPLICATIONS**

### **PRIORITY LIST**

- Zoning Ordinance, Zoning Map & SALDO Amendments
  - Review process will continue with Nanci Sarcinello, Sarcinello Planning & GIS Services on the 4<sup>th</sup> Monday of each month.

### **UNFINISHED BUSINESS**

### **NEW BUSINESS**

### **PUBLIC COMMENT & ADJOURNMENT**

# POCONO TOWNSHIP PLANNING COMMISSION

## Meeting Minutes

February 10, 2025

The regular meeting of the Pocono Township Planning Commission was held on Monday, February 10, 2025 and was opened at 6:00 p.m. by Christina Kauffman, Vice Chair.

### ROLL CALL

Joe Folsom, present; Christina Kauffman, present; Claire Learn, present; Chris Peechatka, present; Dennis Purcell, absent; Jeremy Sawicki, absent; Kyle VanFleet, present.

Planning Commission Alternates: Bruce Kilby, present., Jordan Merring, present.

### IN ATTENDANCE

Amy Montgomery, Twp. Engineer; Leo DeVito, Township Solicitor; Krisann MacDougall, Township Asst. Secretary.

### PUBLIC COMMENT

Robert Danges (Resident) - Questioned the zoning classification of the solar farm, voiced his concerns regarding erosion issues if the trees are cleared as the property is mostly shale, and the solar farm will not benefit the local community.

Dean Wehr (Resident) – Expressed his concerns regarding the proposed solar farm setbacks from residential property lines, the clearing of trees and the lack of benefit to the community.

Jeff Lehman (Resident) – Stated his concerns with the solar farm contaminating the soils from the heavy equipment that will be used to install, stripping of the land and long-term effects of decommissioning solar panels on the environment.

Maria Bras-Danges (Resident) – Stated her concerns regarding the solar farm proposal and the long-term effects on the tourism in the Pocono's with the trees being stripped away for solar panels, health effects on residents living right next door, and if the majority of the taxpayers in the township don't want the plan approved how does it move forward.

Dawn Eilber (Resident) – stated that leaseholders do not have the right to amend a property. She suggested that the property owners in communities affected should be involved in the planning process.

Linda Danges (Non-resident) – Questioned where the power is going for the first solar farm that clear-cut the mountain. She also questioned where the power would be going for the solar farm on the current agenda.

John Tabet (Paradise Summit LLC) – Spoke about having property rights for tree removal on property they own. He gave no guarantee as to where the power would be sold.

Patricia Cassell (Resident) – Spoke of the loss of habitat for the wildlife with the stripping of the mountain, the oxygen and natural heat barrier loss with the clear cutting of the trees.

Floyd King (Resident) – Asked why solar farms cannot be put on commercial parking lots instead of desecrating forests.

Steve Larsen (Resident) – Stated his opinion regarding the overlay as being a back-door way to change zoning. Solar Fields are NOT low impact and the R1 zoning district should not be changeable at the whim of a developer.

Charles Kepler (Resident) – Suggested looking into ways to make it more expensive for developers to buy up the mountainside rather than leasing commercial property for solar projects, emphasizing the importance of maintaining the beauty and natural environment of the Pocono Mountains.

## CORRESPONDENCE

## OLD BUSINESS

C. Learn made a motion, seconded by C. Peechatka, to approve the minutes of the January 13, 2025 meeting of the Pocono Township Planning Commission. All in favor. Motion carried.

## WAIVERS OF LAND DEVELOPMENT

## SKETCH PLANS

Bluewave Solar Array - Summit Rd – LDP 1439

## NEW PLANS

## PRELIMINARY PLANS UNDER CONSIDERATION

- Simpson Minor Subdivision (LDP #1426) – Plans were administratively accepted at the 7/8/24 P.C. meeting with approval deadline of APR. 6, 2025. **Deadline for P.C. consideration is 3/10/25.** J. Folsom made a motion, seconded by C. Peechatka, to recommend the plan for approval to the Board of Commissioners. All in favor. Motion carried.
- Tannersville Point Apartments (LDP# 1358) – Plans were administratively accepted at the 6/10/24 P.C. meeting. Approval deadline of March 31, 2024 **Deadline for P.C. consideration is 03/10/25** C. Peechatka made a motion, seconded by C. Learn, to table the plan. All in favor. Motion carried.
- Brookdale Spa (LDP #1425) – Plans were administratively accepted at the 9/9 24 P.C. meeting with approval deadline of March 17, 2025 **Deadline for P.C. consideration is 3/10/25.** J. Folsom made a motion, seconded by C. Peechatka, to table the plan. All in favor. Motion carried.
- 611 Land Development LLC (LDP #1401) – Dual Brand Hotel – Hotel by Marriot -Plans administratively accepted at the 4/8/24 P.C. meeting. Approval deadline of April 18, 2025. **Deadline for P.C. consideration is 3/10/25.** J. Folsom made a motion, seconded by C. Peechatka, to recommend the waiver of SALDO Section(s) 390-43. A. (10) & 390-47. C. (2). All in favor. Motion carried.

J. Folsom made a motion, seconded by C. Learn, to recommend the waiver of Ordinance No. 2022-06 Section 365-10(I) Buffers, 365.10(I) 8 Streams a, b, c. All in favor. Motion carried.

J. Folsom made a motion, seconded by C. Peechatka, to recommend the waiver of Ordinance No. 2022-06 Section 365-10 (I) Buffers, Section 365.10 (I) Wetlands a, b, c. All in favor. Motion carried.

K. VanFleet made a motion, seconded by C. Learn, to table the plan. All in favor. Motion carried.



- Swiftwater Solar Revision – (LDP 1375A) – Plans were administratively accepted at the 1/13/25 P.C. meeting. Approval deadline of April 13, 2025 ***Deadline for P.C. consideration is 3/10/25.*** J. Folsom made a motion, seconded by C. Peechatka to recommend Phase “C” for approval to the Board of Commissioners. All in favor. Motion carried.  
C. Learn made a motion, seconded by J. Folsom to table the remaining phases on the plan. All in favor. Motion carried.
- 1124 Sky View Drive Mono-pine Tower (LDP# 1424) – Plans were administratively accepted at the 4/8/24 P.C. meeting with approval deadline of June 4, 2025. ***Deadline for P.C. consideration is 5/12/25.*** J. Folsom made a motion, seconded by K. VanFleet, to table the plan. All in favor. Motion carried.
- MCTA Transit Facilities Expansion – (LDP 1437) – Plans were administratively accepted at the 12/9/24 P.C. meeting with approval deadline of June 3, 2025. ***Deadline for P.C. consideration is 5/12/25.*** J. Folsom made a motion, seconded by C. Peechatka to table the plan. All in favor. Motion carried.
- Trap Enterprises Event Center – (LDP 1438) – Plans were administratively accepted at the 1/13/25 P.C. meeting. Approval deadline of April 13, 2025 ***Deadline for P.C. consideration is 3/10/25*** J. Folsom made a motion, seconded by C. Peechatka, to table the plan. All in favor. Motion carried.

C. Peechatka made a motion, seconded by K. VanFleet, to table the following plans listed below. All in favor. Motion carried.

- Cranberry Creek Apartments Land Development Plan (LDP# 1369) – Plans were administratively accepted at the 7/25/22 P.C. meeting. Extension letter request received with approval deadline of August 4, 2025. ***Deadline for P.C. consideration is 7/14/25.***
- 135 Warner Road – JBAR Pocono LLC (LDP# 1414) – Plans were administratively accepted at the 2/12/24 P.C. meeting. Approval deadline of September 9, 2025. ***Deadline for P.C. consideration is 8/10/25.***
- Alaska Pete’s Roadhouse Grille (173 Camelback Road) Land Development Plan (LDP# 1387) – Plans were administratively accepted at the 4/10/23 P.C. meeting. Extension request received with approval deadline of December 31, 2025. ***Deadline for P.C. consideration is 12/8/25.***

## PRIORITY LIST

- Zoning Ordinance, Zoning Map & SALDO Amendments
  - The review process will continue with Nanci Sarcinello, Sarcinello Planning & GIS Services on the 4<sup>th</sup> Monday of each month. ***(February 24th will be our next meeting)***

## PUBLIC COMMENT

Dan McCreary (Resident) – Expressed concern about a single zoning officer making a decision on the solar farm’s classification. Stated it should be considered a commercial operation as it would be selling power, therefore not allowed in a Residential zone.

Jeff Lehman (Resident) – Solar panels are NOT environmentally friendly nor are they recyclable. How is energy more important than oxygen?

Maria Bras-Danges (Resident) – Questioned the process of plans and voting them down. L. DeVito explained the process. She requested the Planning Commission to put pressure on the decision makers to protect the Pocono’s.

Patricia Cassell (Resident) – Suggested that the hotels, spas, and convention centers put the solar panels above their parking lots instead of clearing the mountain.

Robert Danges (Resident) – Stated that the access to the High-Tension wires is the reason they want to put the solar panels there. The property is all shale and stripping the trees will cause major issues with erosion.

Dean Wehr (Resident) – The view from Big Pocono is horrible where once it was beautiful.

Dawn Eilber (Resident) – Skyview Dr. Cell Tower will pollute the neighborhood. The Road is a private road.

Karen Fletcher (Resident) – expressed concerns about the proposed development in Incline Village area, increased traffic and impact on the private road which cannot be paved due to environmental concerns.

John Tabet (Paradise Summit LLC) –He is stated the power will be sold and not sure if it will come back to the community. If single family homes were to be built they would still be clearing trees.

## **ADJOURNMENT**

J. Folsom made a motion, seconded by C. Peechatka, to adjourn the meeting at 8:30 p.m. All in favor. Motion carried.



YOUR GOALS. OUR MISSION.

February 5, 2025

Pocono Township Planning Commission  
112 Township Drive  
Tannersville, PA 18372

**SUBJECT: BROOKDALE SPA – 2436 BACK MOUNTAIN DRIVE  
STORMWATER & TECHNICAL REVIEW NO. 2  
POCONO TOWNSHIP, MONROE COUNTY, PENNSYLVANIA  
POCONO TOWNSHIP LDP NO. 1425, T&M PROJECT NO. POCO-R0680**

Dear Planning Commission Members:

Pursuant to the Township's request, we have performed a review of the Preliminary/Final Land Development Plan Application for Brookdale Spa. The submitted information consists of the following items.

- Response letter to the Land Development Review prepared by RKR Hess, dated December 18, 2024.
- Response letter to the Stormwater Management Review prepared by RKR Hess, dated December 18, 2024.
- Waiver Requests.
- Zoning Determination email from S. McGlynn dated July 15, 2024.
- PADEP Completeness Letter for Ch. 105 Permit dated October 4, 2024.
- Pocono Township Fire Chief Meeting Summary dated October 10, 2024.
- PHMC Response Letter dated November 18, 2024.
- Closure Reports (Overall Net Boundary, Overall Boundary, Stream Easement Lot 2, Utility Easement Lot 1, Utility Easement Lot 3, and Wastewater Treatment Plant Easement).
- Email correspondence from PennDOT regarding the Traffic Analysis Report dated November 25, 2024.
- Well Site Survey correspondence from PADEP dated August 7, 2024.
- Pocono Township Well Permit dated September 27, 2024.
- Subdivision of Land of Edmund C. and Lucy Danisch prepared by Timothy D. Hydrusko dated January 27, 1987.
- Sewer Pump Station Design prepared by RKR Hess, dated August 2024, last revised December 2024.
- Geotechnical Engineering Report for Brookdale Subdivision – Lot 2, prepared by Geo-Technology Associates, Inc., dated August 29, 2024, last revised December 16, 2024.
- Main Building Plan and Elevation prepared by Schoonover & Vanderhoof Architects, LLC, 3 sheets, dated December 10, 2024.
- Employee Housing Plan and Elevation prepared by Schoonover & Vanderhoof Architects, LLC, 2 sheets, dated November 25, 2024.
- Post Construction Stormwater Management (PCSM) & Conveyance Calculations Module 2 prepared by RKR Hess, dated August 30, 2024, last revised December 18, 2024.





- Brookdale Spa Land Development Plan set prepared by RKR Hess, 50 sheets, dated August 30, 2024, last revised December 18, 2024.

## **BACKGROUND INFORMATION**

The Applicant, Brookdale Enterprises, LLC, has submitted a plan proposing the Brookdale Spa Land Development on the southern side of Back Mountain Road, west of the intersection of Dyson and Brookdale Roads. The existing property, Lot 2 of the Brookdale Subdivision, is located within the RD, Recreation Zoning District and consists of a single parcel (Tax ID No. 12/11/1/32-4). The property has an area of 31.59 acres and consists of mostly woodland areas with steep slopes, the Scot Run watercourse, and wetlands.

The site is proposed to be developed with a Nordic style Spa which consists of outdoor thermal and hydrothermal amenities as well as a 2-story 35,000 s.f. building with traditional spa services, restaurant, reception area, retail spaces, and locker rooms. The plans also propose a 2-story 50-bed employee housing building and a maintenance building. The previously submitted narrative states that the spa can accommodate 400 to 525 people and will have up to 55 staff members. Spa services are booked for 4-hour sessions. The plans propose 340 parking spaces, including 9 handicap spaces, 3 bus parking spaces, and 4 off-street loading spaces. Access to the development will be via a driveway taking access from Back Mountain Road. An existing driveway access at the west end of the property is proposed to remain, but not be improved. The plan also depicts above ground and underground stormwater management facilities.

The project is proposed to be served by on-lot water and central sewage disposal. The proposed sewer system consists of a gravity collection system which conveys flows to an onsite pump station. This pump station, with a 5 Hp grinder pump, will discharge through a 4" HDPE force main to the existing Brookdale Resort Wastewater Treatment Facility. The project narrative indicates a total flow from domestic sources of 18,550 gpd.

In accordance with Section 470-19.B.(1)(b) and the 470 Attachment 1 Zoning Use Schedule Commercial indoor and outdoor recreational and entertainment uses, including restaurants, are permitted in the RD District.

The project site is located within Districts A and B-1 Stormwater Management District of the Brodhead-McMichaels Watershed. The receiving water is the Pocono Creek, which has a Chapter 93 classification of High-Quality, Cold-Water Fishery with Migratory Fishes (HQ, CWF/MF).

The Land Development Plan was accepted for review by the Pocono Township Planning Commission at its meeting held on September 9, 2024.

**The following comments are related to our technical review and reflect the design requirements of the Stormwater Management Ordinance, as well as miscellaneous design comments. A planning review reflecting the requirements of the Zoning Ordinance and Subdivision and Land Development Ordinance dated February 3, 2025, was distributed separately.**

Based on our review of the above information and our previous review letter dated October 9, 2024, we offer the following comments and/or recommendations for your consideration.





## **STORMWATER MANAGEMENT ORDINANCE COMMENTS**

**Note that the Applicant is requesting waivers from SWMO requirements as discussed in Comments 2, 10, 11 and 12.**

1. Previous Comment 1 satisfied.
2. In accordance with Section 365-8.L., “Roof drains should not be connected to streets, sanitary or storm sewers or roadside ditches in order to promote overland flow and infiltration/percolation of stormwater. Considering potential pollutant loading, roof drain runoff in most cases will not require pretreatment.” *Roof drain locations shall be provided on the plan. If roof drains will discharge directly into the storm sewer, a waiver must be requested. We would support a waiver to this requirement, since the roof water is “clean” and to allow the water to cross the parking area would add pollutants and increase temperature. (Previous Comment 2). A waiver has been requested to permit roof drains to discharge directly into the storm sewer. The justification states “The proposed use consists of the Nordic spa building and associated amenities including maintenance and employee housing buildings. The buildings have pavement and steep slopes surrounding the improvement area. The increase in stormwater generated from the proposed improvements need to be managed within a stormwater management facility to meet PADEP and Township ordinance requirements. Given the proposed layout and existing topography, there are concerns with erosion and water freezing on pavement in winter conditions if disconnection is proposed. Therefore, it is not practical to disconnect the runoff from streets and storm sewers while also conveying the runoff to the stormwater management basin. The storm sewer collection system from the roofs drains to Basin 1 and 4 which utilizes infiltration and evapotranspiration while also providing water quality benefits.” We have no objection to this request.*
3. In accordance with Section 365-8.M, “all stormwater runoff, other than rooftop runoff discussed in Subsection L above, shall be treated for water quality prior to discharge to surface or groundwater.” Also, in accordance with Section 365-10.C, “For areas within defined special protection subwatersheds which includes exceptional value (EV) and high quality (HQ) waters, the temperature and quality of water and streams shall be maintained through the use of temperature sensitive BMPs and stormwater conveyance systems.” *Snouts are shown on the plan; however, it is our understanding that they are no longer recognized as a water quality BMP. We recommend that the proposed snouts be replaced with water quality inserts, as approved by the Monroe County Conservation District. (Previous Comment 3) The response indicates that MCCD has accepted snouts on previous projects for water quality prior to discharging into stormwater facilities. A copy of the NPDES Permit and letter of determination of erosion and sediment control adequacy shall be provided to the Township upon receipt.*
- 4.-9. Previous Comments 4-9 satisfied.
10. In accordance with Section 365-13.B, “All calculations consistent with this chapter using the Soil Cover Complex Method shall use the appropriate design rainfall depths for the various return period storms according to the region in which they are located as presented in Table B-1 in Appendix A<sup>11</sup> of this chapter. If a hydrologic computer model such as PSRM or HEC-1 is used for stormwater runoff calculations, then the duration of rainfall shall be 24 hours. The NRCS “S” curve shown in Figure B-1, Appendix A of this chapter, shall be used for the rainfall distribution.” *(Previous Comment 10) A waiver has been requested to permit utilizing rainfall values from NOAA Atlas 14 rainfall data. We have no objection to this request.*





11. In accordance with Section 365-13.D, “All calculations using the Rational Method shall use rainfall intensities consistent with appropriate times-of-concentration for overland flow and return periods from the design storm curves from Pennsylvania Department of Transportation Design Rainfall Curves (1986) (Figures B-2 to B-4). Times-of-concentration for overland flow shall be calculated using the methodology presented in Chapter 3 of Urban Hydrology for Small Watersheds, NRCS, TR-55 (as amended or replaced from time to time by NRCS). Times-of- concentration for channel and pipe flow shall be computed using Manning's Equation.” *A waiver from this section has been requested, however additional information justifying the request is required. (Previous Comment 11) A waiver has been requested to permit the use of the Kirpch formula to calculate time of concentration. The justification states “The Kirpch formula is a standard formula for estimating flow times in channels. Manning’s flow requires that you assume a flow rate to drain in a channel with an assumed geometry. This method is suitable for estimating time of concentrations (Tc) and typically yields shorter Tc’s resulting in (slightly) conservative high design rainfall intensities. Therefore, we are requesting to utilize the Kirpch formula for calculating times of concentration.” We have no objection to this request.*
12. In accordance with Section 365-13.E “Runoff curve numbers (CN) for both existing and proposed conditions to be used in the Soil Cover Complex Method shall be obtained from Table B-2 in Appendix A of this chapter.” *A waiver from this section has been requested. The curve number for gravel listed in Appendix A is 98 and the stormwater report utilizes an 89 curve number for gravel. Additional information justifying the request is required. (Previous Comment 12) A waiver has been requested to permit using curve numbers from the PADEP PCSM Spreadsheet. The justification states “The design is proposing to utilize the DEP Spreadsheet curve numbers, a standard more current than the sources referenced in the Stormwater Management Ordinance. These curve numbers are utilized in the NPDES permit applications submitted to MCCD and PADEP. Therefore, for consistency with the NPDES permit application, we are requesting to utilize curve numbers from the DEP spreadsheet for the stormwater management design.” We note that this is not a waiver that the Township has previously granted. For Township required stormwater management design purposes, we recommend the design engineer use the curve numbers as required by the ordinance. PADEP curve number shall be used only for the PADEP and MCCD required calculations.*
13. In accordance with Section 365-15.A, “Any earth disturbance must be conducted in conformance with Pennsylvania Title 25, Chapter 102, Erosion and Sediment Control.” *The proposed disturbance is greater than one acre, therefore, a NPDES Permit from the Monroe County Conservation District is required. All correspondence with, submissions to, and NPDES Permit from the County Conservation District, shall be provided to the Township. (Previous Comment 13) The response letter acknowledges this requirement.*
14. Previous Comment 14 satisfied.
15. In accordance with Section 365-19. B.(19), the stormwater site plan shall contain “A fifteen-foot-wide access easement to and around all stormwater management facilities that would provide ingress to and egress from a public right-of-way.” *This easement shall be provided on the plan. In the alternative, the plan may note a blanket easement for access. (Previous Comment 15) A blanket stormwater easement for access has been added as note 10 of sheet C.C.02. The response indicates the final statement will be finalized in the Stormwater Management Agreement.*



16.-17. Previous Comments 15-17 satisfied.

18. In accordance with Section 365-21. I., “The applicant shall be responsible for completing record drawings of all stormwater management facilities included in the approved stormwater management site plan. The record drawings and an explanation of any discrepancies with the design plans shall be submitted to the Municipal Engineer for final approval prior to the issuance of any occupancy permits. In no case shall the municipality approve the record drawings until the municipality receives a copy of an approved declaration of adequacy and/or highway occupancy permit from the PennDOT District Office (if required), NPDES Permit, consumptive use tracking report, and any other applicable permits or approvals from PA DEP or the Conservation District. The above permits and approvals must be based on the record drawings. This means that if there are changes during construction, the record drawings must be submitted to the PA DEP and the Conservation District for an updated approval if this was not done previously.” *A copy of the NPDES Permit shall be provided to the Township and it shall be noted on the Plans, that if there are changes during construction, the record drawings must be submitted to the PADEP and the Conservation District for an updated approval, if this was not done previously. (Previous Comment 18) The response letter acknowledges this requirement.*
19. In accordance with Section 365-27.A., “For subdivisions and land developments, the applicant shall provide a performance guarantee to the municipality for the timely installation and proper construction of all stormwater management controls as required by the approved stormwater management site plan in the amount and method of payment provided for in Chapter [390](#), Subdivision and Land Development.” *A construction cost estimate for the stormwater management facilities shall be provided to the Township to determine the amount to be required for the performance guarantee. The performance guarantee shall be provided to the Township as part of the Final Plan submission. (Previous Comment 19) The response letter acknowledges this requirement.*
20. In accordance with Section 365-27. C., “At the completion of the project, and as a prerequisite for the release of the performance guarantee, the applicant or his representatives shall:
- 1) Provide a certification of completion from a Pennsylvania-licensed professional engineer, verifying that all required stormwater management facilities have been constructed according to the plans and specifications and approved revisions thereto as follows:  
  
"I (Design Engineer), on this date (date of signature) hereby certify that the stormwater management facilities have all been installed in accordance with the approved Stormwater Management Site Plan for (name of project) and in compliance with the design standards and requirements of the Ordinance."
  - 2) Provide a set of record drawings with a certification from the contractor on the record drawings that states:  
  
"I, (insert signer's name), state that I am the (insert position) of (insert name of contractor) on this date (date of signature), hereby certify (1) that I am duly authorized to make this certification of behalf of (insert name of contractor), and (2) that all stormwater management facilities have been constructed according to the approved plans and specifications and approved revisions thereto.""





*The certification and drawings shall be prepared and provided as required by this Section. (Previous Comment 20) The response indicates the requirements will be added to the Stormwater Management Agreement.*

21. In accordance with Section 365-29., “Prior to approval of the site's stormwater management site plan, the applicant shall sign and record a maintenance agreement in form and substance satisfactory to the Board of Commissioners, covering all stormwater control facilities that are to be privately owned.” *This shall be completed at the time of Final Plan approval and as required by this Section. (Previous Comment 21) The response indicates the requirements will be prepared and executed prior to final approval of the plan.*

### **STORMWATER MANAGEMENT AND STORM SEWER DESIGN COMMENTS**

22.-24. Previous Comments 22-24 satisfied.

25. The following pipe slopes do not match between the Storm Sewer conveyance calculation in the PCSM Report and the plan profiles. The discrepancies shall be corrected.
- I-5;
  - I-4;
  - I-1;
  - B12 through B8;
  - 2-1;
  - 2-6A;
  - 2-6-2B through 2-6-1;
  - 4-1.

*(Previous Comment 25) The response letter states, “the pipe lengths on the plan profiles are from inside structure edge to inside structure edge for the purpose of quantity take offs. The storm sewer conveyance export from Civil 3d is center of structure to center of structure.” A note must be added to the profile plans stating that the pipe lengths are measured are from inside structure edge to inside structure edge so as to avoid confusion during construction.*

26.-32. Previous Comments 26-32 satisfied.

33. Spot elevations are required to confirm the inlet drainage areas. A detailed grading plan shall be provided. *(Previous Comment 33) The response letter states, “The drainage areas are drawn using the surface slope arrow function in Civil 3d. Spot elevations are shown as needed on the post DA maps.” Spot elevations shall be shown on a grading plan, site plan and/or PCSM Plan to identify high points and grade breaks for construction alignment with the proposed drainage area pattern intent.*
34. Previous Comment 34 satisfied.
35. Clarification on how DA 4-15-8C1 (Outdoor pool and amenities area) stormwater will be collected and routed to the manhole shall be provided. *(Previous Comment 35) The response states, “The connection point for the Outdoor Hydrothermal Experience Area is to manhole 4-15-8C1 in the lower parking area. This connection point has been labeled on sheet C.PC.03 and is shown on the profile sheets.” Details of this connection may be provided as shop drawings and the requirement for same shall be noted on the Plans.*





36. The Inlet Drainage Area plans shall be revised to show inlet labels for all storm sewer structures and adjust overlapping texts. *(Previous Comment 36) Plan sheets C.DAI.02 and C.DAI.03 are still showing storm sewer structures without labels. The labels shall be added.*
- 37.-41. Previous Comments 37-41 satisfied.
42. BMP ID-002-3 must be shown in the plan view. The plan appears to have it incorrectly labeled as BMP ID-002-2. *(Previous Comment 42) BMP ID-002-3 must still be labeled on C.PC.01.*
- 43.-52. Previous Comments 43-52 satisfied.
53. The Construction Sequence must be revised to include tree protection fencing, concrete work (including curbing, sidewalks etc.), retaining walls, and offsite improvements. *(Previous Comment 53) The construction sequence must be revised to include tree protection fencing.*

The above comments represent a thorough and comprehensive review of the information submitted, with the intent of giving the Township the best direction possible. However, due to the number and nature of the comments in this review, the receipt of new information may generate new comments.

We recommend the above comments be addressed to the satisfaction of Pocono Township, prior to approval of the Preliminary/Final Land Development & Subdivision Plan.

In order to facilitate an efficient re-review of revised plans, the Design Engineer shall provide a letter, addressing item by item, their action in response to each of our comments.

If you should have any questions regarding the above, please call me.

Sincerely,

Jon S. Tresslar, P.E., P.L.S.  
Township Engineer

JST/arm/cr

cc: Jerrod Belvin – Pocono Township Manager  
Lindsay Scerbo – Zoning Officer  
Leo DeVito, Esq. – Township Solicitor  
Lisa Pereira, Esq. – Broughal & DeVito, LLP  
Brookdale Enterprises, LLC – Applicant  
Nate Oiler, P.E. – RKR Hess, a division of UTRS, Inc.  
Kristina Heaney – Monroe County Conservation District  
Amy R. Montgomery, P.E. – T&M Associates  
Melissa E. Hutchison, P.E. – T&M Associates

## Waiver Request Summary

Brookdale Spa

### Subdivision and Land Development Ordinance

Twp Comment #	SALDO Section	Description	Township Review Letter Comment
17	390-38.C(3)	Financial security for O/M – 15%	The Board of Commissioners must make this determination
25	390-48.T(13)(a)	Driveway Slope – 12%	We have no objection to this waiver request.
26	390-48.T(13)(b)	Driveway width at Road Line	We recommend a mountable median divider be added to the driveway to clearly delineate and separate the ingress and egress lanes while still allowing for the required truck accessibility.
28	390-48.W(1)	Side Slopes	We have no objection to the requested waiver.
32	390-50.D(5)	Grading Side Slopes	We have no objection to the requested waiver.
52	390-52.E.(4)(g)[7]	Water system capacity beyond requirement for sprinklers	We recommend this be referred to the Building Code official for input.
54	390-52.E(4)(i)[1] & [4]	Looped water system	We have no objection to this request.
55	390-52.E(4)(i)[20][a]	Water main size	This may be required once the water system design is completed. It has not been submitted
59	390-52.E(6)(d)[6]	Monitoring well	We have no objection to the requested waiver.
59	390-52.E(6)(d)[9]	Well pumping test	We have no objection to the requested waiver.
61	390-52.G(1)(b)[8]	Concrete Encasement of storm sewer not required if minimum 12" of separation but not 18"	We have no objection to the requested waiver
65	390-55.B(1)	Locate existing trees	We have no objection to the requested waiver
65	390-55.B(1)	Delineate existing trees for preservation	We have no objection to the requested waiver.
69	390-55.C(2)(e)	Rock Mulch for ground cover	Discuss with Planning Commission
72	390-55.C(2)(h)	Plant species	We question the use of this plant material (Bog Rosemary) on this project as it appears to prefer a wet and boggy habitat On the 12-18-2024 submission that the Bog Rosemary was replaced with Winterthur Possumhaw Viburnum, which is on the acceptable plant list – <b>WAIVER REQUEST WITHDRAWN</b>
73	390-55.D(1)(a)	Existing vegetation for Street trees (NEW WAIVER REQUEST)	A waiver request to maintain existing vegetation should be submitted by the applicant.
75	390-55.E.(3) & 390-50.D(8)	Basin Side Slopes & Basin Bottom Slope	We have no objection to the requested waiver.
78	390-55.F(4)(c) & (f)	Site Element Screen Basin 1 (NEW WAIVER REQUEST)	
87	390-58	Open Space Fee In Lieu of	The Board of Commissioners must make this determination.
88	390-59.B	Parking Space width	We have no objection to the requested waiver.



Stormwater Management Ordinance				
Twtp	SALDO Section	Description	Township Review Letter Comment	
Comment #				
SWM 10	365-13(B),	Rainfall Intensity/Data	We have no objection to this request.	
SWM 11	365-13(D)	Rational method	We have no objection to this request.	
SWM 12	365-13 (E), Appendix A	Runoff Curve Numbers	We note this is not a waiver that the Township has previously granted. For Township required stormwater management design purposes, we recommend the design engineer use the curve numbers as required by the ordinance. PADEP curve number shall be used only for the PADEP and MCCD required calculations.	
SWM 2	365-8.L	Roof Drains to discharge to storm sewer	We would support a waiver to this requirement, since the roof water is "clean " and to allow the water to cross the parking area would add pollutants and increase temperature.	

### Determinations

Twtp	SALDO Section	Description	Township Review Letter Comment
29	390-48.AA	Sidewalk along Back Mountain Road	Sidewalks are required to be provided along Back Mountain Road. (Previous Comment 29) The response letter requests that the Township confirm that offsite sidewalks are not required for this project. The Board of Commissioners must make this determination.

### Other Discussion Items

27	390-48.T(14)	Concrete Apron	Discuss requirement
76	390-55.F(3)(c) & Table 390-55-1	Property Buffer Calculation	How to determine how existing vegetation counts for buffer credit
77			Diversity for all species (max % of species) throughout, not just for property buffers.
80	390-55.1	Landscape Architect sealed plan	



YOUR GOALS. OUR MISSION.

February 19, 2025

Pocono Township Planning Commission  
112 Township Drive  
Tannersville, PA 18372

**SUBJECT: SWIFTWATER SOLAR PRELIMINARY/FINAL LAND DEVELOPMENT PLAN  
AMENDED PLAN REVIEW NO. 1 –PHASE D STORMWATER MANAGEMENT  
POCONO TOWNSHIP, MONROE COUNTY, PENNSYLVANIA  
POCONO TOWNSHIP LDP NO. 1375, T&M PROJECT NO. POCO-R0624**

Dear Planning Commission Members:

Pursuant to the Township's request, we have performed our first review of the Amended Preliminary/Final Land Development Plan for Swiftwater Solar. The submitted information was prepared by Timmons Group and consists of the following items.

- Amended Preliminary/Final Land Development Plan dated September 24, 2021, revised December 6, 2024.
- E&S Report and Compliance Narrative dated May 28, 2021, revised October 18, 2024.
- PCSM Report and Compliance Narrative dated May 28, 2021, revised October 18, 2024.

### **BACKGROUND INFORMATION**

The site is located east of Interstate Route 380 (SR 0380), north and adjacent to Sullivan Trail Road (SR 4004) and Back Mountain Road, west of Summit Road and south of Swiftwater Creek. The property is located within the RD, Recreation Zoning District. The Applicant is leasing Tax Map Parcel 12/16/1/, 1 and a large portion of Tax Map Parcel 12/111903 for the project. The total leased area of the site is 643.99 acres, of which 471.20 acres are proposed to be disturbed. The site consists of woodlands, steep slopes, wetlands, a pond, and an existing private road which takes access from Back Mountain Road. Parcel 12/111903 has Floodway and Floodplain Area along Swiftwater Creek; however, the Floodway and Floodplain are outside of the leased area of the site.

The proposed development will include the construction of a fenced enclosure, solar panel fields, a substation, gravel access roads, underground electric lines, and sixteen (16) infiltration detention basins. The site drains to three different watersheds: Swiftwater Creek to the North, Dry Sawmill Run to the Southwest, and Scot Run to the Southeast. Access to the property will be via a single driveway entrance from Back Mountain Road. Water and sewer service are not proposed for this project.

**This amended plan removes the bulk site grading and includes impervious areas such as the MV Skids and the substation.**





**This review includes Zoning Ordinance and Subdivision and Land Development Ordinance Comments related to the entire project site, and comments related to the stormwater management design in Phase D only. Separate reviews will be provided for Phases A, B, and C.**

Based on our review of the above information, we offer the following comments and/or recommendations for your consideration.

### **SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS**

*Comments 1 through 6 discuss waivers that were previously requested from the Subdivision and Land Development Ordinance and granted by the Board of Commissioners at its meeting held on June 6, 2022.*

1. In accordance with Section 390-48.H.(1), “wherever there exists a dedicated or platted portion of a road or alley along a boundary of the tract being subdivided or developed the remainder of said road or alley shall be platted to the width required by this chapter based on the classification of the road within the proposed development”. *A waiver from Section 390-48.H.(1) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to not required widening of Sullivan Trail and Summit Road. This amended plan does not change or provide access to and does not change the volume of traffic along Sullivan Trail or Summit Road.*
2. In accordance with Section 390-48.K.(2), “the private access road shall not exceed 750 feet in length as measured from the edge of the right-of-way of the abutting road to the point of connection to the lot. The width of the private access road shall conform to Table 390-48-1. Any proposed road exceeding the seven-hundred-fifty-foot length shall comply with all normal standards which apply to road construction.” *A waiver from Section 390-48.K.(2) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit the proposed private access road to be longer than 750-feet and to not meet the requirements of Table 390-48-1. This amended plan does not revise the proposed private access road.*
3. In accordance with Section 390-50.D.(4), “the maximum water depth, measured from the invert of the lowest outlet orifice to the peak one-hundred-year water surface elevation, shall not exceed five feet”. *A waiver from Section 390-50.D.(4) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit the stormwater stored in the proposed basins to have a depth greater than 5-feet. The basin design in Phase C of this Amended Plan does not alter the previous request. Further review of Basin 305 is pending receipt of the proposed re-design.*
4. In accordance with Section 390-50.D.(5), “the maximum slope of the earthen detention basin embankments shall be four horizontal to one vertical”. *A waiver from Section 390-50.D.(5) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit the grading at the proposed basins to exceed a slope of 4:1. The basin design in Phase C of this Amended Plan does not alter the previous request.*
5. In accordance with Section 390-50.D.(7), “the minimum top width of the detention basin berm shall be 10 feet”. *A waiver from Section 390-50.D.(7) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to not require a berm width of 10-feet in cut sections. The basin design in Phase C of this Amended Plan does not alter the previous request.*



6. In accordance with Section 390-50.D.(8), “in order to ensure proper drainage on the basin bottom, a minimum grade of 2% shall be maintained for areas of sheet flow. For channel flow, a minimum grade of 1% shall be maintained.” *A waiver from Section 390-50.D.(8) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit flat bottom basins. The basin design in Phase C of this Amended Plan does not alter the previous request.*
7. In accordance with Section 390-51.A, “all soil erosion and sedimentation control plans shall meet the specifications of the Monroe County Conservation District and PA DEP, and shall comply with Commonwealth of Pennsylvania, Title 25, Chapter 102, Department of Environmental Protection regulations for soil erosion and sedimentation control”. *The amended Land Development Plan shall meet the requirements of Chapter 102 and will require an amendment to the existing NPDES Permit. All submissions to, correspondences with, and permit from the County Conservation District shall be provided.*

### **STORMWATER MANAGEMENT ORDINANCE COMMENTS**

*Comments 8 and 9 discuss waivers that were previously requested from the Stormwater Management Ordinance and granted by the Board of Commissioners at its meeting held on June 6, 2022.*

8. In accordance with Section 365-11.A.(3), the size of the recharge facility shall be based on the volume criteria in Subsection (a). *A waiver from Section 365-11.A.(3) was granted by the Board of Commissioners at its meeting on June 6, 2022 to permit the use of the PADEP water quality spreadsheets to satisfy this requirement. The basin design in Phase C of this Amended Plan does not alter the previous request.*
9. In accordance with Sections 365-13.B and D, “all calculations consistent with this chapter using the Soil Cover Complex Method shall use the appropriate design rainfall depths for the various return period storms according to the region in which they are located as presented in Table B-1 in Appendix A<sup>III</sup> of this chapter”. *Waivers from Sections 365-13.B and 365-13.D were granted by the Board of Commissioners at its meeting on June 6, 2022 to permit the use of the NOAA rainfall data. The basin design in Phase C of this Amended Plan does not alter the previous request.*
10. In accordance with Section 365-15, “for all regulated earth disturbance activities, erosion and sediment control BMPs shall be designed, implemented, operated, and maintained during the regulated earth disturbance activities (e.g., during construction) to meet the purposes and requirements of this chapter and to meet all requirements under Title 25 of the Pennsylvania Code and the Clean Streams Law. Various BMPs and their design standards are listed in the Erosion and Sediment Pollution Control Program Manual (E&S Manual3), No. 363-2134-008, as amended and updated.” *The amended Land Development Plan shall meet the requirements of Chapter 102 and will require an amendment to the existing NPDES Permit. All submissions to, correspondences with, and permit from the County Conservation District shall be provided.*

### **STORM SEWER AND STORMWATER MANAGEMENT DESIGN COMMENTS**

11. A Unit Hydrograph Summary showing the drainage area and CN value shall be provided in support of the post development peak flow calculation for Basin 101.





The above comments are related to previously approved waivers, outside agency approvals, and general revisions to the plans and reports. We recommend the Township approve Phase D with conditions.

In order to facilitate an efficient re-review of revised plans, the Design Engineer shall provide a letter, addressing item by item, their action in response to each of our comments.

If you should have any questions regarding the above comments, please call me.

Sincerely,

Jon S. Tresslar, P.E., P.L.S.  
Township Engineer

JST/meh

cc: Jerrod Belvin, Manager – Pocono Township  
Lindsay Scerbo, Zoning Officer – Pocono Township  
Leo DeVito, Esquire – Township Solicitor  
Lisa Pereira, Esquire – Broughal & DeVito, LLP  
Daniel Jamison, P.E., Timmons Group  
Colby Dechiara, Timmons Group  
Amanda Mills, Narenco  
Ralph A. Matergia, Esquire  
David Velasco, VC Renewables  
James M. Cahill, Pocono Mountain Investors  
Kristina Heaney, Manager – Monroe County Conservation District  
Amy R. Montgomery, P.E. – T&M Associates  
Melissa E. Hutchison, P.E. – T&M Associates



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[www.timmons.com](http://www.timmons.com)

February 20<sup>th</sup>, 2025

Jon S. Tresslar, P.E., P.L.S.  
Township Engineer  
Pocono Township Planning Commission  
112 Township Drive  
Tannersville, PA 18372

RE: Swiftwater Solar Preliminary/Final Land Development Plan  
Amended Plan Review No. 1 – Phase D Stormwater Management  
Pocono Township, Monroe County, Pennsylvania  
Pocono Township LDP No. 1375, T&M Project No. POCO-R0624

Jon,

Per your comments in the email provided February 20<sup>th</sup>, 2025 (Land Development Plans), please find below your requested additional information, in italics, followed by responses to those comments in bold:

**SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS:**

*Comments 1 through 6 discuss waivers that were previously requested from the Subdivision and Land Development Ordinance and granted by the Board of Commissioners at its meeting held on June 6, 2022:*

1. In accordance with Section 390-48.H.(1), “wherever there exists a dedicated or platted portion of a road or alley along a boundary of the tract being subdivided or developed the remainder of said road or alley shall be platted to the width required by this chapter based on the classification of the road within the proposed development.” *A waiver from Section 390-48.H.(1) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to not require widening of Sullivan Trail and Summit Road. This amended plan does not change or provide access to and does not change the volume of traffic along Sullivan Trail or Summit Road.*

**Response: Comment noted. Timmons agrees that no changes to this approved waiver have been incorporated with this modification request.**

2. In accordance with Section 390-48.K.(2), “the private access road shall not exceed 750 feet in length as measured from the edge of the right-of-way of the abutting road to the point of connection to the lot. The width of the private access road shall conform to Table 390-48-1. Any proposed road exceeding the seven-hundred-fifty-foot length shall comply with all normal standards which apply to road construction.” *A waiver from section 390-48.K.(2) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit the proposed private access road to be longer than 750-feet and to not meet the requirements of Table 390-48-1. This amended plan does not revise the proposed private access road.*

**Response: Comment noted. Timmons agrees that no changes to this approved waiver have been incorporated with this modification request.**

3. In accordance with Section 390-50.D.(4), “the maximum water depth, measured from the invert of the lowest outlet orifice to the peak one-hundred-year water surface elevation, shall not



exceed five feet". A waiver from Section 390-50.D.(4) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit stormwater stored in the proposed basins to have a depth greater than 5-feet. The basin design in Phase C of this Amended Plan does not alter the previous request. Further review of Basin 305 is pending receipt of the proposed re-design.

**Response:** Comment noted. Timmons agrees that no changes to this approved waiver have been incorporated with this modification request.

4. In accordance with Section 390-50.D.(5), "the maximum slope of the earthen detention basin embankments shall be four horizontal to one vertical". A waiver from 390-50.D.(5) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit the grading at all the proposed basins to exceed a slope of 4:1. The basin design in Phase C of this Amended Plan does not alter the previous request.

**Response:** Comment noted. Timmons agrees that no changes to this approved waiver have been incorporated with this modification request.

5. In accordance with Section 390-50.D.(7), "the minimum top width of the detention basin berm shall be 10 feet". A waiver from 390-50.D.(7) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to not require a berm width of 10-feet in cut sections. The basin design in Phase C of this Amended Plan does not alter the previous request.

**Response:** Comment noted. Timmons agrees that no changes to this approved waiver have been incorporated with this modification request.

6. In accordance with Section 390-50.D.(8), "in order to ensure proper drainage on the basin bottom, a minimum grade of 2% shall be maintained for areas of sheet flow. For channel flow minimum, a minimum grade of 1% shall be maintained". A waiver from 390-50.D.(8) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit flat bottom basins. The basin design in Phase C of this Amended Plan does not alter the previous request.

**Response:** Comment noted. Timmons agrees that no changes to this approved waiver have been incorporated with this modification request.

7. In accordance with Section 391-51.A, "all soil erosion and sedimentation control plans shall meet the specifications of the Monroe County Conservation District and PA DEP, and shall comply with Commonwealth of Pennsylvania, Title 25, Chapter 102, Department of Environmental Protection regulations for soil erosion and sedimentation control". The amended Land Development Plan shall meet the requirements of Chapter 102 and will require and amendment to the existing NPDES Permit. All submissions to, correspondences with, and permit from the County Conservation District shall be provided.

**Response:** Comment noted. Timmons has submitted for a modification request through the Monroe County Conservation District. An approval to this modification request will be provided to the Pocono Township once received.

**STORMWATER MANAGEMENT ORDINANCE COMMENTS:**

Comments 8 and 9 discuss waivers that were previously requested from the Stormwater Management Ordinance and granted by the Board of Commissioners at its meeting held on June 6, 2022:

8. In accordance with Section 365-11.A.(3), the size of the recharge facility shall be based on the volume criteria in Subsection (a.) *A waiver from 365-11.A.(3) was granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit the use of the PADEP water quality spreadsheets to satisfy this requirement. The basin design in Phase C of this Amended Plan does not alter the previous request.*

**Response:** Comment noted. Timmons agrees that no changes to this approved waiver have been incorporated with this modification request.

9. In accordance with Section 365-13.B and D, “all calculations consistent with this chapter using the Soil Cover Complex Method shall use the appropriate design rainfall depths for the various return period storms according to the region in which they are located as presented in Table B-1 in Appendix A of this chapter.” *Waivers from 365-13.B and D were granted by the Board of Commissioners at its meeting held on June 6, 2022 to permit the use of NOAA rainfall data. The basin design in Phase C of this Amended Plan does not alter the previous request.*

**Response:** Comment noted. Timmons agrees that no changes to this approved waiver have been incorporated with this modification request.

10. In accordance with Section 365-15, “for all regulated earth disturbance activities, erosion and sediment control BMPs shall be designed, implemented, operated, and maintained during the regulated earth disturbance activities (eg., during construction) to meet the purposes and requirements of this chapter and to meet all requirements under Title 25 of the Pennsylvania Code and the Clean Stream Act. Various BMPs and their design standards are listed in the Erosion and Sediment Control Program Manual (E&S Manual3), No 363-2134-008, as amended and update.” *The amended Land Development Plan shall meet the requirements of Chapter 102 and will require an amendment to the existing NPDES Permit. All submissions to, correspondences with, and permit from the County Conservation District shall be provided.*

**Response:** Comment noted. Timmons has submitted for a modification request through the Monroe County Conservation District. An approval to this modification request will be provided to the Pocono Township once received.

**STORM SEWER AND STORMWATER MANAGEMENT DESIGN COMMENTS:**

11. A Unit Hydrograph Summary showing the drainage area and CN value shall be provided in support of the post development peak flow calculation for Basin 101.

**Response:** The routing model for Basin 101 has been revised to include the Unit Hydrograph Summary that displays the supporting information requested. This can be located on Appendix G - Page 87/961 of the narratives provided.

We hope to have adequately addressed your concerns and questions with this submittal. Please contact me at (804) 200-6538 or [dan.jamison@timmons.com](mailto:dan.jamison@timmons.com) with questions concerning this additional information.



Sincerely,  
**Timmons Group**

A handwritten signature in blue ink, appearing to read 'Dan Jamison', with a long horizontal flourish extending to the right.

Dan Jamison, PE  
Team Leader



YOUR GOALS. OUR MISSION.

February 6, 2025

Pocono Township Planning Commission  
112 Township Drive  
Tannersville, PA 18372

**SUBJECT: TRAPASSO HOTEL EVENT CENTER PRELIMINARY/FINAL MAJOR  
SUBDIVISION AND LAND DEVELOPMENT PLAN REVIEW NO. 1  
POCONO TOWNSHIP, MONROE COUNTY, PENNSYLVANIA  
POCONO TOWNSHIP LDP NO. 1438, T&M PROJECT NO. POCO-R1040**

Dear Planning Commission Members:

Pursuant to the Township's request, we have performed our first review of the Preliminary/Final Major Subdivision and Land Development Plan for the Trapasso Hotel Event Center. The submitted information consists of the following items.

- Letter of Transmittal to Pocono Township prepared by Pennoni, dated December 13, 2024.
- Modification of Required Standards letter prepared by Pennoni, dated December 13, 2024.
- Letter of Transmittal to the Monroe County Planning Commission prepared by Pennoni, dated December 13, 2024.
- MCPC Subdivision and Land Development Review Checklist.
- Property Deed, Deed Book 2568, Page 8965.
- Property Deed, Deed Book 2615, Page 9430.
- Ordinance 2015-11, Vacation of Old State Route 168.
- Highway Occupancy Permit No. 05054497 Trip Generation Letter prepared by Pennoni, dated October 30, 2024.
- Community Impact Analysis prepared by Pennoni, dated December 10, 2024.
- PCSM Report prepared by Pennoni, dated December 13, 2024.
- Preliminary/Final Major Subdivision and Land Development Plan (23 sheets) prepared by Pennoni, dated December 13, 2024.





## **BACKGROUND INFORMATION**

The Applicant, Trap Enterprises, LLC, is proposing a subdivision and land development at property located on the western side of State Route 0611, adjacent to and including lands of the existing Desaki restaurant and Swiftwater Hotel.

The proposed subdivision includes the consolidation of three (3) existing parcels; Existing Lot 1, Existing Lot 3, and the former Birch Street parcel. Existing Lot 1 has an area of 5.44 acres, is located within the C, Commercial Zoning District, and consists of the Desaki restaurant and Swiftwater Hotel with associated parking and access from State Route 0611 through the former Birch Street parcel. Existing Lot 3 has an area of 4.57 acres, is located within the R-D, Recreation Zoning District, and consists of woodlands. Existing Lot 3 was also utilized to stockpile material from the recent construction of the Swiftwater Hotel and is accessed through the former Birch Street parcel. The former Birch Street parcel has an area of 0.25 acres, is located within the C, Commercial Zoning District, and includes driveway access to Existing Lots 1 and 3 from State Route 0611. There are no floodplains on the site per FEMA FIRM 42089C0254E dated May 2, 2013.

The proposed consolidation of Existing Lot 1, Existing Lot 3, and the former Birch Street parcel will create Proposed Lot 1A having an area of 10.26 acres. The existing Desaki restaurant, Swiftwater Hotel, and driveway accessing State Route 0611 will remain.

The proposed development consists of the construction of a 10,050 square foot event center on the former Existing Lot 3. The event center will include outdoor hosting space and associated parking and will be accessed via the existing driveway. Subsurface stormwater management is proposed, and the event center will be served by public water and public sanitary sewer.

Based upon our review of the above information, we offer the following comments and/or recommendations for consideration.

## **MAJOR SUBDIVISION AND LOT CONSOLIDATION PLAN**

### **SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS**

1. In accordance with Section 390-22, “in cases where a parcel is being subdivided in order to convey one or more lots, the survey of the entire parent parcel may be waived by the Board, provided the remaining parcel is greater than 30 acres in size and the applicant can demonstrate to the satisfaction of the Township that an adequate description of the parent parcel is on record which may be a recorded survey map or recorded deed description.” *While we acknowledge that the remaining portion of the Parcel No. 12.11.1.32-5 is greater than 30 acres and therefore is exempt from survey requirements, the entire tract shall be shown on a plan with adequate descriptions as shown on a recorded survey map or recorded deed description.*
2. In accordance with Section 390-27.A.(3), “the survey shall not have an error of closure greater than one in 10,000 feet and shall include a boundary closure report”. *A metes and bounds description shall be provided for the new consolidated lot and the remaining lands of Parcel No. 12.11.1.32-5.*
3. In accordance with Section 390-27.B.(10), “a plat of the area proposed to be subdivided, including



the tract boundaries, if appropriate, road lines and names, lot lines, rights-of-way or easements (existing and/or proposed, if any)” shall be provided. *A subdivision plan shall be submitted showing Parcel No. 12.11.1.32-5 in its entirety with the area subdivided that will then be consolidated with Parcel No. 12.11.1.8-3. The subdivision plan shall include all applicable information required by Section 390-27.B.*

## **LAND DEVELOPMENT PLAN**

### **ZONING ORDINANCE COMMENTS**

4. In accordance with Sections 470-19.B.(1)(m) and 470-20.B.(1)(gg), customary accessory uses that are incidental to a permitted use is allowed within the RD, Recreation and C, Commercial Zoning Districts. In addition, and in accordance with Section 470-53, accessory uses which are customarily subordinate to the principal use of a lot or a building located on the same lot and which serve a purpose customarily incidental to the use of the principal dwelling or lot shall be permitted in each district. Such uses include “other uses appurtenant to other permitted, special exception or conditional uses.

*The submitted Land Development Plan lists the proposed event center as accessory to the existing hotel and restaurant. Per Sections 470-19.B.(1) and 470-20.B.(1), and Attachment 1, Use Schedule, the hotel and restaurant are permitted uses within the RD, Recreation and C, Commercial Zoning Districts.*

*We believe the proposed event center is a permitted customary use to the existing hotel and restaurant.*

5. In accordance with Section 470-19.C.(1)(c), “maximum impervious coverage [shall be] 35% for residential uses, 80% for other uses.” *Revise the Zoning Compliance Summary table on plan sheet 2 to reference 80% maximum impervious coverage for the RD District.*
6. In accordance with Section 470-34.A, “any building or other structure erected, enlarged, altered or used and any lot used or occupied for any of the following purposes shall be provided with the minimum off-street parking spaces as set forth herewith.” *The parking calculation for a hotel requires the parking calculation for restaurants and other accessory uses be viewed separately. Eighty-three (83) parking spaces are proposed for the hotel event center. A parking requirement for the event center or any similar use is not provided. The Applicant shall provide justification showing that the proposed 83 parking spaces will be sufficient.*

### **SUBDIVISION AND LAND DEVELOPMENT ORDINANCE COMMENTS**

*One waiver is requested from the Subdivision and Land Development Ordinance as discussed in Comment 50.*

7. In accordance with Section 390-17.M, “upon completion of all improvements, the applicant shall provide to the Township two paper sets of plans and one... in PDF format certified by the applicant’s engineer showing all such improvements as installed to document conformance to the record plan.” This requirement is also referenced in Section 390-19.Q. *Add a note to plan sheet 2 stating that as-built plans are required to be submitted to the Township upon completion of all*





*improvements.*

8. In accordance with Section 390-19.F.(6)(c), “the applicant shall be responsible for submission of the plan and all required supporting documentation to the Monroe County Planning Commission, the Monroe County Conservation District, PennDOT, and all other governing agencies”. *Submissions to, correspondences with, and approval from the following outside agencies shall be provided to Pocono Township:*
  - a. *Monroe County Planning Commission*  
  
*Per Section 390-19.I, “no official action shall be taken by the Board of Commissioners until either the Township has received the comments of the Monroe County Planning Commission or a period of 30 days has expired following transmittal of the preliminary plan to the County Planning Commission”.*
  - b. *Monroe County Conservation District/Pennsylvania Department of Environmental Protection – Erosion Control Adequacy and NPDES Permit*
  - c. *Pennsylvania Department of Environmental Protection – Sewage Facilities Planning Module*  
  
*Per Section 390-19.J, “the Township shall concurrently make its decision on the sewage facilities planning module, and if approval is granted, the completed sewage planning documents shall be forwarded to the Pennsylvania Department of Environmental Protection. Preliminary plan approval shall be conditional upon Department of Environmental Protection sewage planning approval.”*
  - d. *Pennsylvania Department of Transportation – Highway Occupancy Permit*  
  
*A copy of PennDOT Permit No. 05054497 is included in the submitted Trip Generation Letter. In addition, submitted PennDOT correspondence dated November 18, 2024 indicates that a new traffic impact study or permit review are not required.*
  - e. *Pocono Township Sewer – sanitary sewer service design and capacity*
  - f. *Brodhead Creek Regional– water service will-serve and sewage treatment capacity*
  - g. *Pocono Township Volunteer Fire Company*
9. In accordance with Section 390-25.F.(14), the plan shall include the “location of proposed shade trees, plus locations of existing vegetation to be retained”. *The existing landscaping approved with the hotel development shall be shown on this plan.*
10. In accordance with Sections 390-29.D(2) and 390-29.G(1), the Existing Resources and Site Analysis shall include “a vertical aerial photograph enlarged to a scale not less than one inch equals 400 feet, with the site boundaries clearly marked.” *Provide an enlarged aerial photograph as required.*
11. In accordance with Sections 390-29.D.(2) and 390-29.G.(2), the Existing Resources and Site



Analysis shall include “topography, the contour lines of which shall generally be at two-foot intervals although ten-foot intervals are permissible beyond the parcel boundaries, interpolated from USGS published maps. The determination of appropriate contour intervals shall be made by the Planning Commission, which may specify greater or lesser intervals on exceptionally steep or flat sites. Slopes between 15% and 25% and exceeding 25% shall be clearly indicated. Topography for major subdivisions shall be prepared by a professional land surveyor or professional engineer from an actual field survey of the site or from stereoscopic aerial photography and shall be coordinated with official USGS bench marks the location and datum of which shall be shown on the plan.” *Steep slopes greater than 20% are delineated on the Existing Features and Demolition Plan (Sheet CS0201). The plan shall be revised to also delineate steep slopes between 15% and 25% and steep slopes greater than 25% as required.*

12. In accordance with Sections 390-29.D.(2) and 390-29.G.(7), the Existing Resources and Site Analysis shall include “a viewshed analysis using GIS or other suitable methodology showing the location and extent of views into the property and along ridgelines from critical points along adjoining public roads and how the views will be affected by the proposed development and what design elements will be used to minimize the visual effects”. *Provide the required Viewshed Analysis with Observation Points.*
13. In accordance with Sections 390-29.D.(3) and 390-29.H.(1) through (3), “a resource impact and conservation analysis shall be prepare for all land development applications to categorize the impacts of the proposed activities and physical alterations on those resources shown on the existing resources and site analysis.” *A Resource Impact and Conservation Analysis chart shall be provided on the plan listing the existing area, disturbed area, and protected area of each existing natural resource.*
14. In accordance with Section 390-29.I.(2), the plan shall include “existing and proposed lot lines, lot areas, full lot grading, driveway locations and elevations, and any existing easements and rights-of-way.” *Covenant #17 on the General Notes sheet (CS0002) states that “an access easement is established through lands now or formerly of Brookdale Resort Inc. provided for ingress and egress to and from lands of Trap Enterprises, LLC.” This access easement shall be shown and labeled on the plan.*
15. In accordance with Section 390-29.I.(9), the plan shall include “limit-of-disturbance line (must be exact in relation to the retention of existing trees proposed to be saved).” *The plan shows trees/vegetation to be removed outside of the limit-of-disturbance in the area near the proposed level spreader. Revise the limit-of-disturbance to include all trees/vegetation to be removed.*
16. In accordance with Section 390-29.I.(17)(c), the plan shall include “zoning district boundary lines within 1,000 feet of the proposed land development, shown on location map.” *Provide zoning district boundary lines on the location map as required.*
17. In accordance with Section 390-29.I.(19), the plan shall include the “address of the project.” *Provide the project site address on the plan.*
18. In accordance with Section 390-29.J.(1)(c), the plan shall include “truck turning movement diagrams for at least a WB-50 truck”. *The fire truck turning diagram shall be provided to the Fire Company for its review. The WB-50 truck circulation plan appears to show the truck topping the*





*curb in several locations. This shall be addressed.*

19. In accordance with Section 390-29.J.(2), the submission shall include “exterior elevations of any proposed buildings including at least the front and side elevations”. *Architectural plans shall be submitted for review.*
20. In accordance with Section 390-29.J.(6), the submission shall include “proof of legal interest in the property, a copy of the latest deed of record and a current title search report”. *A title search report shall be completed and submitted.*
21. In accordance with Section 390-29.J.(7)(c), the submission shall include “a letter from the water company or authority stating that said company or authority will supply the development including a verification of adequacy of service.” *A will-serve letter from the Brodhead Creek Regional Authority shall be provided upon receipt.*
22. In accordance with Section 390-29.J.(8)(a), the submission shall include “completed sewage facilities planning module(s) for land development and other required sewage planning documents as required by the Pennsylvania Sewage Facilities Act<sup>31</sup> and PA DEP”. In addition, and in accordance with Section 390-29.J.(8)(c), “if service by the Township, a sewer authority or a public utility is proposed, a letter or other written certification from the Township, the authority or the public utility stating that it will provide the necessary sewer service and verifying that its system has adequate capacity to do so”. *Approvals from Pocono Township and the Pennsylvania Department of Environmental Protection shall be received prior to plan recordation. In addition, revise the Township Sewer Engineer contact (Mike Gable) on the Utility User List to reference T&M Associates rather than LVL Engineering Group.*
23. In accordance with Section 390-29.J.(9), the plan shall include “a list of any public utility, environmental or other permits required and if none are required a statement to that effect. The Township may require a professional engineer's certification of such list”. *Provide a list of Required Approvals on the plan.*
24. In accordance with Section 390-29.J.(10), the submission shall include “confirmation that the soil erosion and sedimentation control plan has been accepted for review by the Monroe County Conservation District”. *All submissions to, correspondence with, and permit from the County Conservation District/PADEP shall be provided.*
25. In accordance with Section 390-29.K, the submission shall include “a community impact analysis including the following information shall be required for land developments containing 15 or more dwelling units or residential lots in the aggregate; all nonresidential developments (with the exception of agricultural development) with buildings containing in excess of 20,000 square feet of floor space in the aggregate; or development of any kind impacting 30 acres of land or more in the aggregate”. *A Community Impact Analysis has been included with this submission. We offer the following comments regarding the analysis:*
  - (2a) “Anticipated annual revenues to the Township and the school district for each of the first five years of the development and at project build-out.” *The “Financial Analysis” section of the analysis references a Fiscal Impact Analysis prepared by the Monroe County Planning Commission. Please provide a copy of this analysis to the Township.*



- (3) "Phase I environmental site assessment (PESA)." *A Phase I Environmental Site Assessment has not been provided. The applicant's response in the Community Impact Analysis states "Historically the Site presented no concerns to the environment prior to and after the construction to the restaurant and hotel. As the proposed improvements to the Site are an expansion of the existing use, and no new hazards are proposed, a Phase I Environmental Assessment is not required at this time." The area for development was not included in a previous environmental site assessment and the Applicant shall discuss the need for a Phase I study with the Township.*
26. In accordance with Section 390-29.N, "prior to approval of the land development plan, the applicant shall submit to the Township a land development plan engineering certification stating that the proposed layout of proposed roads, lots, and open lands complies with the Township's ordinances, particularly those sections governing the design of subdivision roads and stormwater management facilities, and that all improvements will be installed in accord with the specific requirements of this chapter or any waivers or modifications granted by the Township. This certification requirement is meant to provide the Township with assurance that the proposed plan is able to be accomplished within the Township's current regulations". *A note to this effect shall be placed on the plan.*
27. In accordance with Section 390-32.B.(2), no final plan shall be signed by the Board of Commissioners for recording in the office of the Monroe County Recorder of Deeds until proposed developer's agreements and performance guarantee in accord with § 390-35 and the Pennsylvania Municipalities Planning Code, Act 247 of 1968 as amended,<sup>III</sup> have been accepted by the Board of Commissioners". *All agreements shall be executed, and financial security posted prior to plan recordation. A construction cost estimate shall be submitted for review.*
28. In accordance with Section 390-43.A.(6)(e)[1][a], "steep slope area is defined and established as those areas having an original, unaltered slope of 20% or greater." *Steep slopes of 20% or greater are delineated on the northern side of the site. However, it appears there are additional steep slopes located on the western and southwestern sides of the site. It is our understanding that the site was the location of a stockpile for the previous hotel development. If these slopes were man-made (i.e. from the stockpile), they should be labeled as such on the plan.*
29. In accordance with Section 390-43.A.(6)(e)[2][e], "the final plan shall be recorded with a steep slope easement. The easement shall be comprised of at least 65% of the total existing area and located within the original boundaries of the steep slope area." *The Required Steep Slope Easement shown on the plan should be revised to exclude the areas of steep slopes which are being disturbed.*
30. In accordance with Section 390-43.A.(14), "lots and/or parcels shall be laid out and graded to provide positive drainage away from buildings and to prevent damage to neighboring lots, tracts, or parcels. Stormwater management shall be provided in accord with Township stormwater regulations." *The proposed grading shows a low spot at the southwest corner of the building. The grading shall be revised to ensure positive drainage away from the building. In addition, a high spot elevation shall be provided between yard inlets F-3 and F-2.*
31. In accordance with Section 390-46.A, "where earthwork, grading, or construction activities will take place in or adjacent to woodlands, old fields or other significant vegetation or site features, the Township may require that the limit of disturbance be delineated and vegetation protected





through installation of temporary fencing or other approved measures.” *Revise the Erosion and Sedimentation Control Plan to show tree protection fencing and provide a detail. Per Section 390-55.B(2), the tree protection fencing shall also be shown on the Landscape Plan.*

32. In accordance with Section 390-48.O, “easements shall also be provided for all stormwater drainage ditches, sewers, and watercourses. All easements shall be shown on the preliminary and final plans.” *There is a proposed swale and earthen level spreader on the adjacent property having Parcel ID# 12.11.1.32-5. While we acknowledge that the subject property and the adjacent parcel have the same owner, an easement must be established in the event that the adjacent lands come under separate ownership.*
33. In accordance with Section 390-48.O.(2)(b), “all existing and proposed utility easements shall be shown and labeled on the plan and included in the restrictive covenants as appropriate.” *Covenant note #16 on the General Notes sheet (CS0002) states “a utility easement is established 10 foot either side of the center of sanitary and water mains.” Revise the plan to show and label the proposed water easement. A proposed sanitary sewer easement is shown on the Utility Plan (CS1701). The plan should also be revised to show and label both utility easements with metes and bounds on the Record Plan (CS1001).*
34. In accordance with Section 390-48.S, “at all road intersections and all land development driveways/accesses, a triangular area shall be graded and/or other sign obstructions removed in such a manner as not to obscure vision between a height of two to 10 feet above the center-line grade of the intersection roads.” *Covenant note #11 on the General Notes sheet (CS0002) references the required clear sight triangle. Revise the Record Plan (CS1001) and Landscape and Lighting Plan (CS2001) to show and label the clear sight triangle.*
35. In accordance with Section 390-48.W, “the maximum slope of any earth embankment or excavation shall not exceed one foot vertical to three feet horizontal unless stabilized by a retaining wall or cribbing, except as approved by the Board of Commissioners for special conditions.” *There are slopes higher than one vertical to three horizontal above the proposed retaining wall and in the locations of Swale F-1 and Swale D-1. Slope protection matting shall be provided along these areas and stability calculations shall be submitted for review.*
36. In accordance with Section 390-48.W(4), “cuts and fills shall be stabilized to prevent surface water from damaging the cut face of excavations of the sloping surfaces of fills.” *Provide permanent erosion control on the proposed swales (Swale F-1, Swale D-1 and Swale A). The slope protection matting and rock riprap referenced in the Vegetated Channel and Riprap Channel Details shall be shown in plan view.*
37. In accordance with Section 390-48.AA, “sidewalks and road crosswalks may be required where necessary to provide proper pedestrian circulation or to provide access to community facilities and common areas. Sidewalks, where required or provided, shall be located within the road right-of-way immediately adjacent to the curbs, except as may be approved by the Township to accommodate road trees or other landscaping. Sidewalks and road crosswalks shall be constructed in accord with the most current PennDOT RC67M standard and Americans With Disabilities Act standards.” *The Applicant shall discuss with the Township the need for sidewalk along S.R. 0611 and for accessibility to nearby bus stops.*



38. In accordance with Section 390-49.A.(4), “monuments shall be set at all outbound locations where permanent monuments did not exist at the time of the perimeter survey unless site conditions preclude the installation and the missing monument shall be noted on the final plan. Existing monuments shall not be removed.” *General Note #13 on the General Notes sheet (CS0002) states that “property monuments will be set in accordance with the Pocono Township SALDO at completion of construction activities.” Revise the plan to show the location of the proposed monuments.*
39. In accordance with Section 390-51, “all soil erosion and sedimentation control plans shall meet the specifications of the Monroe County Conservation District and PA DEP, and shall comply with Commonwealth of Pennsylvania, Title 25, Chapter 102, Department of Environmental Protection regulations for soil erosion and sedimentation control”. *All submissions to, correspondences with, and permits from the County Conservation District and Pennsylvania Department of Environmental Protection shall be provided to the Township. The following comment is related to our review of the Erosion and Sedimentation Control Plan, Notes, and Details (Sheets CS8001 to CS8503).*
  - a. *Revise the Sequence of Earthmoving Operations to reference the removal of the temporary earthen level spreader.*
40. In accordance with Section 390-52.A.(1), “all subdivisions and land developments shall be served by an adequate water supply and sewage disposal system; and the developer shall provide evidence documenting said adequacy”. *Approvals from the Brodhead Creek Water Authority, Pocono Township, and the Pennsylvania Department of Environmental Protection in support of the water and sanitary sewer services shall be provided upon receipt.*
41. In accordance with Section 390-52.A.(7), “pressure testing of all collection/conveyance of any centralized water supply or centralized sewage disposal system lines shall be required as part of the inspections required in accord with Article V of this chapter. All such testing shall be conducted in accord with the procedures specified by the Township Engineer.” *Notations requiring pressure testing of the water supply and sewage system lines shall be placed on the plan.*
42. In accordance with Section 390-52.E.(4)(f)[1], “fire hydrants suitable for the coupling of equipment serving the Township shall be installed as specified by the Insurance Services Office of Pennsylvania and shall comply with applicable fire company standards. Location of hydrants shall be approved by the Township.” *Proposed fire hydrant locations shall be reviewed and approved by the Pocono Township Fire Department.*
43. In accordance with Section 390-52.E.(5), “distribution systems serving commercial or industrial developments shall provide for a minimum flow rate of at least 2.5 times the projected average daily flow rate or a minimum flow rate in accordance with the standards of the National Fire Underwriters Association, whichever is greater.” *A note shall be added to the plan to ensure compliance with this requirement.*
44. In accordance with Section 390-52.G.(1)(d)[4], “minimum lateral diameter shall be four inches and minimum slopes shall be 2%.” *Portions of the proposed sanitary lateral have less than the required 2.0% slope and shall be revised to comply.*





45. In accordance with Section 390-52.G.(1)(d)[5], the “maximum length of a lateral shall be 150 feet.” *The proposed sanitary lateral is longer than 150 feet and shall be revised for compliance with this Section.*
46. In accordance with Section 390-52.G.(1)(d)[6], “the minimum cover [over the sanitary sewer lateral] shall be four feet to prevent crushing and freezing”. *As shown in the Sanitary Sewer Profile on the Sanitary Sewer Profile And Notes sheet (CS4002), the cover at San MH-5 is less than 4-feet and the profile shall be revised.*
47. In accordance with Sections 390-52.G.(1)(d)[8][a] and [b], “cleanouts shall be provided at intervals not greater than 50 feet for four-inch diameter laterals and 100 feet for six-inch diameter laterals” and “within 10 feet of building foundations.” *Revise the plan to include a sanitary lateral cleanout within 10 feet of the building.*
48. In accordance with Section 390-52.G.(1)(d)[9], “an interceptor trap shall be placed between the curblin and the building. The trap shall be cast-iron or PVC single running trap with vent. The riser and vent shall be on the building side of the trap.” *Revise the plan to include the required interceptor trap and provide a detail.*
49. In accordance with Section 390-55.B, “each development site shall include a minimum of 12 deciduous or evergreen trees for each one acre.” *A total of 124 trees are required (10.26\*12). The Landscape Compliance Summary chart shall be revised. The Landscape Compliance Summary chart on the Landscape and Lighting Plan (CS2001) lists that there were previously 90 proposed trees and currently 50 proposed trees. Identify where the previous 90 trees are and confirm that they are still there and in good health. In addition, the Planting Schedule on the Landscape and Lighting Details sheet (CS6005) lists 4 Nyssa sylvatica site planting trees, however, we only count 1. Please clarify.*
50. In accordance with Section 390-55.C.(2)(e), “planting islands shall be a minimum of nine feet by 18 feet in dimension, underlain by soil (not base course material); mounded at no more than a 3:1 slope, nor less than a 5:1 slope; and shall be protected by curbing or bollards. Each planting island shall contain a minimum of one shade tree plus shrubs and/or ground cover sufficient to cover the entire area.” *The Applicant is requesting a waiver to permit less than one shade tree per planting island due to the location of the underground infiltration system being underneath one of the planting islands. A total of 8 planting islands with 7 shade trees are proposed.*
51. In accordance with Sections 390-55.D.(1)(a) and (e), “street trees shall be required along all existing streets abutting or within the proposed subdivision or land development” and “between nonresidential buildings.” In accordance with Section 390-55.D.(3)(d), “trees shall be planted at a ratio of at least one tree per 50 linear feet of frontage or fraction thereof. Trees shall be distributed along the entire frontage of the property, although they need not be evenly spaced.” *Thirteen (13) street trees are required along Route 611. A waiver to permit only five (5) street trees was granted by the Board of Commissioners during review of the hotel development. The five (5) existing trees shall be shown on the plan. Should the required 13 street trees not be provided with this land development then a waiver will be required.*
52. In accordance with Section 390-55.F.(3)(a)[1], “property line and road right-of-way buffers are required for... all nonresidential development.” The following buffers are required by Table 390-



55-1 and Section 390-55.F.(3)(e).

- a. *A 20-foot wide high intensity buffer is required along the rear property lines (total distance = 917.76-feet). The buffer shall include 46 evergreen trees, 19 ornamental trees, and 19 canopy trees. The plan proposes to utilize the existing woodlands as the required buffer.*

*Per Section 390-55.F.(3)(g), “existing healthy trees, shrubs, or woodlands may be substituted for part or all of the required plants with the approval of the Township. The minimum quantities and/or visual effect of the existing vegetation shall be equal to or exceed that of the required buffer as determined by the Township.” The Applicant shall discuss with the Township utilizing the existing woodlands to meet the buffer requirements.*

- b. *A 20-foot high intensity buffer is required along the northern side property lines (total distance = 547.18-feet). The buffer shall include 28 evergreen trees, 11 ornamental trees, and 11 canopy trees. The plans shall be revised to indicate how this buffer will be satisfied.*
- c. *A 15-foot medium intensity buffer is required along the southern side property lines (total distance = 1445.06-feet). The buffer shall include 29 canopy trees, 29 ornamental trees, and 29 evergreen trees. The plan proposes to utilize the major change in grade as the required buffer along the side property line in common with Parcel No. 12.11.1.32-5.*

*In accordance with Section 390-55.F(3)(h), “existing topographic conditions, such as embankments or berms, in conjunction with existing vegetation, may be substituted for par[t] or all of the required property line buffers with the approval of the Township. The minimum visual effect shall be equal to or exceed that of the required buffer.” The Applicant should discuss the use of existing topographic conditions as the required buffer with the Township.*

*The plan proposes plantings to meet the required buffer along the side property line in common with the rear lot line of Parcel No. 12.11.1.9. The plans shall be revised to indicate how the buffer will be satisfied along the side property line in common with Parcel No. 12.11.1.10 and the side property lines in common with the side lot lines of Parcel No. 12.11.1.9.*

- d. *A 30-foot high intensity parking lot buffer is required along the right-of-way of Route 611 (total distance = 680.35-feet). The buffer shall include 34 evergreen trees, 14 ornamental trees, and 14 canopy trees. The plans shall be revised to indicate how this buffer will be satisfied.*

53. In accordance with Section 390-55.I.(2)(c), the landscape plan shall include “all existing and proposed contours at an interval deemed adequate by the Township to determine the relationship of planting and grading areas with slopes in excess of 3:1.” *Revise the landscape plan to show existing and proposed contours.*
54. In accordance with Section 390-55.I.(2)(k), “a detailed cost estimate shall be submitted, showing the value of all proposed landscaping, including all labor and materials”. *The construction cost estimate shall include landscaping.*





55. In accordance with Section 390-56.A.(4)(a)[2], “description of the proposed equipment shall be included [on the lighting plan], including fixture catalog cuts, photometrics, glare-reduction devices, lamps and mounting heights.” *Revise the lighting plan to provide the required information. In addition, provide details for pole mounting and footers. Mounting heights will be reviewed for compliance with Section 390-55.A.(5)(c) once this information is provided. Also revise the manufacturer lighting details provided on the Landscape and Lighting Details sheet (CS6005) to indicate which options are proposed and revise the Luminaire Schedule Descriptions on the Landscape and Lighting Plan (CS2001) to match.*
56. In accordance with Section 390-56.A.(5)(a), “all lighting fixtures for off-street parking areas, off-street loading areas, driveways and for safety of persons and property must meet IESNA full cutoff.” *Confirm that all proposed light fixtures are IESNA full cutoff.*
57. In accordance with Section 390-58.C.(1), “the proposal for common open space, installation of recreation facilities and/or fees shall be offered for review by the Planning Commission and the Pocono Township Park and Recreation Committee”. *General Note 12 on the General Notes sheet (CS0002) states that a fee-in-lieu of open space shall be provided to the Township based on the disturbed area. This fee shall be \$6,860 (4.9 acres \* \$1,400/acre). The Applicant shall discuss the payment of a fee with the Township. Per Section 390-58.K, if the Township agrees to the payment of a fee, the fee shall be paid prior to the recording of the final plan.*
58. In accordance with Section 390-59.A.(6), “all parking areas for four or more vehicles shall include clearly defined and marked traffic patterns, with the utmost care taken to provide for safe internal traffic movement and to avoid conflicts between vehicles and pedestrians.” *Since there is depressed curb along the dropoff area, provide bollards or another form of protection to avoid conflicts between vehicles and pedestrians on the sidewalk.*

## **STORMWATER MANAGEMENT ORDINANCE COMMENTS**

*Waivers are requested from sections of the Stormwater Management Ordinance as discussed in Comments 59 and 62.*

59. In accordance with Section 365-8.L, “roof drains and sump pumps shall discharge to infiltration or vegetative BMPs wherever feasible. Roof drains should not be connected to streets, sanitary or storm sewers or roadside ditches in order to promote overland flow and infiltration/percolation of stormwater. Considering potential pollutant loading, roof drain runoff in most cases will not require pretreatment”. *The Applicant is requesting a waiver to allow the roof drain to discharge directly to the storm sewer system in order to not bypass the proposed Underground Infiltration System.*

*The roof drains shall be shown on the plan to confirm the discharge locations and that all roof drains will ultimately discharge to the proposed Underground Infiltration System. If all roof leaders drain to the Underground Infiltration System (an infiltration BMP) a waiver is not required.*

60. In accordance with Section 365-8.M, “all stormwater runoff, other than rooftop runoff discussed in Subsection L above, shall be treated for water quality prior to discharge to surface or



groundwater”. *Water quality devices shall be utilized to treat stormwater runoff prior to it entering the proposed Underground Infiltration System.*

61. In accordance with Section 365-10.A.(1), “for water quality and stream-bank erosion, the objective is to design a water quality BMP to detain the proposed conditions' two-year, twenty-four-hour design storm flow to the existing conditions' one-year, twenty-four-hour design storm flow using the NRCS Type II distribution. Additionally, provisions shall be made (such as adding a small orifice at the bottom of the outlet structure) so that the proposed conditions' one-year, twenty-four-hour design storm flow takes a minimum of 24 hours to drain from the facility, from a point where the maximum volume of water from the one-year, twenty-four-hour design storm is captured (i.e., the maximum water surface elevation is achieved in the facility).” *It does not appear the post development 2-year peak flow is reduced to below the predevelopment 1-year peak flow in POI 4 or for the Total Site. The peak flow calculations shall be revised for compliance with this Section.*
62. In accordance with Section 365-11.A.(2)(a), “a minimum depth of 24 inches between the bottom of the BMP and the limiting zone”. *A waiver is requested to permit over excavation of the proposed underground infiltration system due to encountered bedrock. Testing results shall be submitted for further review.*
63. In accordance with Sections 365-11.B.(2) and 365-11.B.(3), “provide site-specific infiltration test results (at the level of the proposed infiltration surface) in accordance with the BMP Manual and/or ASTM Guide No. D5126 to determine the appropriate hydraulic conductivity rate. “Design the infiltration structure for the required storm volume based on field- determined capacity with the appropriate safety factors applied (as noted in the Pennsylvania Stormwater Best Management Practices Manual) at the level of the proposed infiltration surface.” *Testing results shall be submitted for review.*
64. In accordance with Section 365-12.A and Table 365-12, the B-2 Stormwater Management District requires the post development peak flows during the 2-, 5, 25-, 50-, and 100-year storm events be reduced to below the predevelopment peak flows during the 1-, 2-, 5-, 10-, and 50-year storm events. *It does not appear the required post development peak rates meet these requirements for POI 1, POI 4, or the Total Site. The calculations shall be revised and/or additional calculation provided to show compliance with this Section. In addition, Table 1, Pre to Post Comparison – Peak Runoff Rate does not appear to apply to this project and shall be revised.*
65. In accordance with Section 365-13.D, times-of-concentration for overland flow shall be calculated using the methodology presented in Chapter 3 of Urban Hydrology for Small Watersheds, NRCS, TR-55 (as amended or replaced from time to time by NRCS). Times-of- concentration for channel and pipe flow shall be computed using Manning's Equation. *The time of concentration path shall be shown on the plan and an associated calculation shall be provided for review for all predevelopment and post development drainage areas to confirm the 5-minutes time of concentration utilized in the peak flow calculations. In addition, the minimum time of concentration per the TR-55 manual shall be 6 minutes.*
66. In accordance with Section 365-13.F, “runoff coefficients (c) for both existing and proposed conditions for use in the Rational Method shall be obtained from Table B-3 in Appendix A of this chapter”. *The runoff coefficients utilized in the Conveyance Runoff Calculations for the Inlet*





*Drainage Areas and the Permanent Swale Drainage Areas shall be revised for compliance with this Section.*

67. In accordance with Sections 365-15.A and 365-19.A.(4), for all regulated earth disturbance activities, erosion and sediment control BMPs shall be designed, implemented, operated, and maintained during the regulated earth disturbance activities (e.g., during construction) to meet the purposes and requirements of this chapter and to meet all requirements under Title 25 of the Pennsylvania Code and the Clean Streams Law. Various BMPs and their design standards are listed in the Erosion and Sediment Pollution Control Program Manual (E&S Manual3), No. 363-2134-008, as amended and updated. All reviews and letters of adequacy obtained by the Conservation District shall be submitted upon receipt. *A PADEP NPDES Permit is required. All submissions to, correspondence with, and permit from the County Conservation District shall be provided. Refer to Comment 39 for comments related to our review of the Erosion and Sedimentation Control Plan, Notes, and Details (Sheets CS8001 to CS8503).*
68. In accordance with Section 365-19.B.(7), the plan shall include “soil names and boundaries; along with any limitations associated with the soil type and the proposed resolution of the listed limitations”. *The existing soils shall be delineated on the Pre Development Drainage Area Map, Post Construction Drainage Area Map, and Inlet and Swale Drainage Area Map. The existing soils include groups C and D. The Predevelopment and Post-Development Conditions Weighted Curve Number calculations and the Conveyance Runoff Calculations for Swales D-1, F-1, and A shall be revised accordingly. In addition, the NRCS Soil Map and report shall include soil LyE.*
69. In accordance with Section 365-19.B.(8), the plan shall include the “limits of earth disturbance, including the type and amount of impervious area that would be added”. *The limit of disturbance shall be shown on the Pre Development Drainage Area Map and Post Construction Drainage Area Map to confirm the land use areas and curve number calculations in the PCSM Report.*
70. In accordance with Section 365-19.B.(14), the plan shall include “the total tract boundary and size with accurate distances to hundreds of a foot and bearings to the nearest second”. *The metes and bounds of the property shall be provided on the Post Construction Stormwater Management Plan (Sheet CS9001).*
71. In accordance with Section 365-19.B.(22), the plan shall include “a statement, signed by the applicant, acknowledging that any revision to the approved stormwater management site plan must be approved by the municipality and that a revised E&S plan must be submitted to the Conservation District for a determination of adequacy”. *The required statement shall be placed on the plan.*
72. In accordance with Section 365-19.B.(23), the plan shall include “the following signature block for the design engineer (Pennsylvania-licensed professional engineer):

I, (Design Engineer), on this date (date of signature), hereby certify that the Stormwater Management Site Plan meets all design standards and criteria of the Pocono Township Stormwater Management Ordinance. The word 'certify' is an expression of professional opinion by the undersigned and does not constitute a guarantee or warranty.



*The required signature block shall be placed on the plan.*

73. In accordance with Section 365-27.A, “for subdivisions and land developments, the applicant shall provide a performance guarantee to the municipality for the timely installation and proper construction of all stormwater management controls as required by the approved stormwater management site plan in the amount and method of payment provided for in Chapter 390, Subdivision and Land Development”. *A construction cost estimate including all stormwater management and storm sewer facilities shall be submitted for review.*

#### **STORMWATER MANAGEMENT AND STORM SEWER DESIGN COMMENTS**

74. The meadow areas shall be clearly identified on the Inlet and Swale Drainage Area Map to confirm land use areas and the rational coefficient calculations.
75. The Weighted Curve Numbers for Post Development DA-4 Undisturbed and Post Development DA-4U Undisturbed shall be provided in the Post-Development Conditions Curve Numbers calculations.
76. The Weighted Curve Number for Post Development POI 1 Disturbed provided in the Post-Development Conditions Curve Numbers calculation is incorrect and shall be revised.
77. The Weighted Curve Number for Post Development DA-1U Disturbed calculated in the Post-Development Conditions Curve Numbers calculation is inconsistent with that utilized in the hydrograph. It appears the hydrograph should be revised.
78. The existing pipe information (size, inverts, material) at proposed inlet INL-95 shall be provided in the plan and profile views.
79. The cover at inlet INL-95 is less than 1-foot and shall be addressed.
80. The invert out elevations are slightly higher than the invert in elevations at YD F-2, INL F-4, and INL F-5. The elevations shall be revised.
81. The rim and top of grate elevations at INL F-2, INL F-1, DMH F-2, OS F-1, and INL-94 are inconsistent between the profiles on Sheet CS4001 and the Storm Sewer Tabulation. The elevations shall be revised.

#### **MISCELLANEOUS COMMENTS**

82. On Sheet CS1501, the label for INL F-8 is illegible and the plan shall be revised.
83. The storm sewer between INL F-8 and DMH F-3 shall be shown on the Utility Plan (Sheet CS1701).
84. The Concrete Sidewalk detail on Sheet CS6001 shall be revised to specify Type S concrete as required by PennDOT Publication 408.





The above comments represent a thorough and comprehensive review of the information submitted, with the intent of giving the Township the best direction possible. However, due to the number and nature of the comments in this review, the receipt of new information may generate new comments.

We recommend the above comments be addressed to the satisfaction of Pocono Township, prior to approval of the Preliminary/Final Major Subdivision and Land Development Plan.

In order to facilitate an efficient re-review of revised plans, the Design Engineer shall provide a letter, addressing item by item, their action in response to each of our comments.

If you should have any questions regarding the above comments, please call me.

Sincerely,

Jon S. Tresslar, P.E., P.L.S.  
Township Engineer

JST/meh/ram

cc: Jerrod Belvin, Manager – Pocono Township  
Lindsay Scerbo, Zoning Officer – Pocono Township  
Leo DeVito, Esquire. – Township Solicitor  
Lisa Pereira, Esquire – Broughal & DeVito, LLP  
Vincent Trapasso, Trap Enterprises, LLC – Applicant  
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Kristina Heaney, Manager – Monroe County Conservation District  
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